

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

MARY MADISON

Plaintiff,

CREATIVE WERKS, LLC &  
STEVEN SCHROEDER, Individually

Defendant.

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Case No. 23CV16476

Hon. Honorable Manish S. Shah

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants, Creative Works LLC (“Creative Werks”) and Steve Schroeder (“Schroeder”), by their attorneys, Dickinson Wright, PLLC submit this Motion for Summary Judgment, in conjunction with their Memorandum of Law in Support of their Motion for Summary Judgment and Rule 56.1 Statement of Undisputed Material Facts, stating as follows:

1. Plaintiff, Mary Madison (“Plaintiff” or “Madison”) raises claims under Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981, against her former employer, Creative Werks. (Docket No. 1) Plaintiff asserts that she was discriminated based on her sex and her race and that she was retaliated against for engaging in protected activities.

2. Pursuant to Fed. R. Civ. P. 56, Defendants seek summary judgment of the entire Complaint, asserting in partial part that there are no genuine issue as to any material fact and that the Defendants are entitled to judgment as a matter of law.

3. When the undisputed facts are taken into account, Plaintiff cannot prove all of the necessary *prima facie* elements of the statutes in question.

4. Specifically, with regard to Plaintiff’ Title VII and §1981 claims, among other elements, she must prove evidence of discrimination. Here, Plaintiff is unable to do that in this action.

5. With regard to her Title VII retaliation claims, among other elements, Plaintiff must

prove evidence of having engaged in protected activity and a causal connection to some adverse employment action taken in regard to same by the employer. Here, Plaintiff is unable to do that in this action.

Wherefore, Defendants, Steven Schroeder and Creative Werks, respectfully request this Court grant their Motion for Summary Judgment, and enter summary judgment in favor of the Defendants and grant such other relief as this Court deems just and appropriate, including but not limited to costs incurred by Defendants, in amounts sought to be demonstrable through a prove-up hearing.

Respectfully submitted, Creative  
Werks LLC and Steven Schroeder

By: s/Jon D. Cohen  
One of their attorneys

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